Douglas Saker Pro Se Creditor UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

Re: Chapter 11

CELSIUS NETWORK, LLC., et al., Case No. 22-10964 (MG)

MOTION TO CONSIDER TETHERGOLD (XAUT) CREDITORS AS SECURED CREDITORS

Retail investor Douglas Saker moves to classify TetherGold (XAUT), backed 100% by physical gold held in Swiss vaults as a security. Making the creditors of such coins held by the debtors into secured creditors.

Under bankruptcy code priority rules, secured creditors are entitled to receive the entire value of the collateral securing their claims up to the full amount they are owed.

Wherefore, the undersigned hereby request that all depositors of TetherGold (XAUT) in the Celsius Earn Program and custody wallets be considered as secured creditors in these Chapter 11 bankruptcy proceedings, and that they be paid back the full United States Dollar value of these coins.

Respectfully,

Douglas Saker

Pro Se